

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

EDGEWOOD HIGH SCHOOL
OF THE SACRED HEART, INC.,
Plaintiff,

v.

CITY OF MADISON, WISCONSIN;
CITY OF MADISON ZONING BOARD
OF APPEALS; CITY OF MADISON
PLAN COMMISSION; and CITY OF
MADISON COMMON COUNCIL;
Defendants.

Case No. 3:21-CV-118

DECLARATION OF SARAH A. ZYLSTRA

I, Sarah A. Zylstra, under penalty of perjury, declare as follows:

1. I am an attorney representing the Defendants in the above-reference matter. I offer this declaration in support of Defendants' Motion to Declare Discovery Closed or, in the alternative, to Limit the Search for Records.
2. Attached to this Declaration as Exhibit A is a true and correct copy of email correspondence between myself and Attorney Ingrisano from September 7-22, 2022 related to Edgewood High School's proposed search for City records.
3. Attached to this Declaration as Exhibit B is a true and correct copy of email correspondence between myself and Attorney Ingrisano from September 23, 2022 related to Edgewood High School's proposed search for City records.
4. For its production, Edgewood did not provide load files when it produced records to the City, but instead removed the metadata of all its records

before production. As a result, any records in Edgewood's production cannot be removed to narrow the search.

5. The City believes it is able to remove some of the documents that it has previously produced from the results but does not believe it will narrow the search results significantly and some duplication is inevitable; the City estimates that at most, removing documents previously produced will remove 300-500 documents.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Executed this 23rd day of September, 2022.

/s/ Sarah A. Zylstra
Sarah A. Zylstra

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